



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112

Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

October 29, 2019

Delivered electronically to "lancewgurel@gmail.com"

Subject: Complaint filed by Glen Morgan, PDC Case 57244

Dear Lance Gurel:

Below is a copy of an electronic letter sent to Glen Morgan concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted in the letter to Glen Morgan, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1) and will not conduct a more formal investigation into these allegations or take further enforcement action in this matter.

PDC staff is reminding you about the importance of the complete and accurate disclosure of all expenditure activities, as well as the full disclosure of sponsor identification on political advertising, and the importance of future timely, complete and accurate filings of all PDC reports and sponsor identification disclosures in accordance with the statutes and rules.

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Tabitha Townsend
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavallee
Executive Director



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October 29, 2019

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding Lance Gurel, PDC Case 57244

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on September 9, 2019. The complaint alleged that Lance Gurel (Respondent), a candidate for City Council Member for City of Spokane Valley may have violated RCW 42.17A.235, .240 for failure to accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing details of expenditures undertaken by the Campaign; RCW 42.17A.320 for failure to include sponsor identification on political advertising; RCW 42.17A.445 for misuse of campaign funds for personal use.

PDC staff reviewed the allegations; the applicable statutes, rules, and reporting requirements; the responses provided by the Respondent; the applicable PDC reports filed by the Respondent; and queried the Respondent’s data in the PDC contribution and expenditure database, to determine whether the record supports a finding of one or more violations.

Based on staff’s review, we found the following:

- Pursuant to RCW 42.17A.235, .240 the Respondent is required to timely, completely, and accurately report contributions and expenditures undertaken by the campaign.
- The Respondent reported an expenditure of radio advertising without the sub-vendor information, run dates and times as per required by RCW 42.17A.240, WAC 390-16-037 and WAC 390-16-205 on C-4 report 100928567 filed September 6, 2019.
- On October 16, 2019, the Respondent filed amended C-4 report 100938708, to disclose the expenditure of \$1,005 to The Clark Company for KXLY AM Primary Election advertising that ran July to August.
- Pursuant to 42.17A.320 and WAC 390-18-010, the Respondent is required to include sponsor identification on political advertising, including the sponsor’s name and address.
- The Respondent did not have the sponsor identification clearly identified on the front page of their social media page but added the sponsor identification to their social media site’s front page in a readily visible location.
- Pursuant to RCW 42.17A.445 the candidate and candidate’s authorized committee are not permitted to use campaign funds for personal use, unless otherwise enumerated.
- The Respondent disclosed an in-kind contribution of \$25, from Ashli Hoffman, for a haircut received on July 11, 2019, indicating that no campaign funds were expended.
- The Respondent is a first-time candidate, appearing on the August 6, 2019 Primary Election ballot and will appear on the November 6, 2019 General Election ballot.

- The Respondent has no prior violations of PDC laws or rules.

Based on our findings staff has determined that, in this instance for failure to accurately file Summary Full Campaign Contribution and Expenditure reports (C-4 reports) disclosing details of expenditures undertaken by the Campaign and failure to include sponsor identification on political advertising does not amount to a violation that warrants further investigation.

PDC staff is reminding Lance Gurel about the importance of the complete and accurate disclosure of all expenditure activities, as well as the full disclosure of sponsor identification on political advertising, and the importance of future timely, complete and accurate filings of all PDC reports and sponsor identification disclosures in accordance with the statutes and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Tabitha Townsend at 1-360-586-4555 toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

/s

Tabitha Townsend
Compliance Coordinator

Endorsed by,

/s

Barbara Sandahl
Deputy Director
For Peter Lavalley
Executive Director

cc: Lance Gurel